

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEVEN SKLAR, Plaintiff, v. BANK OF AMERICA CORP., et al. Defendants.	No. 09 Civ. 580 (DC) ECF CASE <u>THIS DOCUMENT RELATES TO: THE SECURITIES CLASS ACTIONS</u>
FINGER INTERESTS NUMBER ONE LTD. Plaintiff, v. BANK OF AMERICA CORPORATION, et al. Defendants.	No. 09 Civ. 606 (DC)
FORT WORTH EMPLOYEES' RETIREMENT FUND, et al., Plaintiffs, v. BANK OF AMERICA CORPORATION, et al. Defendants.	No. 09 Civ. 638 (DC)

**SUPPLEMENTAL DECLARATION OF GEOFFREY C. JARVIS IN SUPPORT OF THE
MOTION OF THE CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM AND
THE CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR
CONSOLIDATION OF THE SECURITIES CLASS ACTIONS AND APPOINTMENT AS
LEAD PLAINTIFF, AND IN OPPOSITION TO THE COMPETING MOTIONS**

<div>FRANK PALUMBO, et al., Plaintiff, v. BANK OF AMERICA CORPORATION, et al. Defendants.</div>	No. 09 Civ. 740 (DC)
<div>CHARLES ZITNER, Plaintiff, v. BANK OF AMERICA CORPORATION, et al. Defendants.</div>	No. 09 Civ. 881 (DC)
<div>FRED STABBERT, Plaintiffs, v. BANK OF AMERICA CORP., et al. Defendants.</div>	No. 09 Civ. 928(DC)
<div>GARY WELIKSON, Plaintiffs, v. BANK OF AMERICA CORPORATION, et al. Defendants.</div>	No. 09 Civ. 1463 (DC)

WEST PALM BEACH FIREFIGHTERS'
PENSION FUND,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, et al.

Defendants.

No. 09 Civ. 1612 (DC)

GEOFFERY C. JARVIS hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a director of Grant & Eisenhofer P.A. (“Grant & Eisenhofer”), counsel for the California State Teachers’ Retirement System (“CalSTRS”) and the California Public Employees’ Retirement System (“CalPERS” and collectively with CalSTRS the “California Funds”). I am admitted to practice in the Southern District of New York, among other jurisdictions. I submit this supplemental declaration in further support of the California Funds’ motion for consolidation of the securities class actions, appointment as lead plaintiff, and approval of the selection of Grant & Eisenhofer as lead counsel.

2. Attached hereto as Exhibit A is a true and correct copy of a court filing titled The U.S. Public Fund Group’s Memorandum of Law in Further Support of its Motion for Appointment as Lead Plaintiff and in Opposition to All Competing Movants, submitted in *Saltzman v. Citigroup, Inc.*, No. 07-9901-SHS (S.D.N.Y. 2008), dated January 28, 2008.

3. Attached hereto as Exhibit B is a true and correct copy of materials downloaded from the web site of the Council of Institutional Investors ([Http://www.cii.org/about/history](http://www.cii.org/about/history)).

4. Attached hereto as Exhibit C is a true and correct copy of materials downloaded from the web site of the International Corporate Governance Network ([Http://www.icgn.org/organisation/index.php](http://www.icgn.org/organisation/index.php)).

5. Attached hereto as Exhibit D is a true and correct copy of materials downloaded from the web site of the Extractive Industries Transparency Initiative ([Http://eitransparency.org/eiti/summary](http://eitransparency.org/eiti/summary)).

6. Attached hereto as Exhibit E is a true and correct copy of materials downloaded from the web site of the National Association of State Retirement Administrators ([Http://www.nasra.org/AboutNasra/whoweare.htm](http://www.nasra.org/AboutNasra/whoweare.htm)).

7. Attached hereto as Exhibit F is a true and correct copy of materials downloaded from the web site of the National Council on Teacher Retirement ([Http://www.nctr.org/About%20NCTR/index.html](http://www.nctr.org/About%20NCTR/index.html)).

8. Attached hereto as Exhibit G is a true and correct copy of materials downloaded from the web site of the Principles for Responsible Investment ([Http://www.unpri.org/about/](http://www.unpri.org/about/)).

9. Attached hereto as Exhibit H is a true and correct copy of an affidavit from Marte Castaños (Senior Staff Counsel for CalPERS), dated April 13, 2009.

10. hereto as Exhibit I is a true and correct copy of an affidavit from Michelle Cunningham (Director, Fixed Income for CalSTRS), dated April 13, 2009.

11. Attached hereto as Exhibit J is a true and correct copy of an affidavit from Kathleen Andleman (General Counsel for CalSTRS), dated April 13, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of April 2009 in Wilmington, Delaware.

s/ Geoffrey C. Jarvis
Geoffrey C. Jarvis